

## **REMARKS/ARGUMENTS**

### **Status of the Application**

Prior to this amendment, claims 1-30 were pending.

Claims 1, 2, 11, 18 and 29 have been amended. No claims have been added or canceled. Hence, after entry of this amendment, claims 1-30 remain pending for examination.

Claims 1-2, 11-12 and 18 have been rejected under 35 U.S.C. §102(b) as being anticipated by cited portions of U.S. Patent No. 5,913,078 to Kimura et al. ("Kimura"). Claims 3-5, 7-10, 13-17, 19-25 and 27-30 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Kimura et al. in view of the cited portions of U.S. Patent No. 6,023,241 to Clapper ("Clapper"). Claims 6 and 26 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Kimura et al. in view of Clapper, and further in view of the cited portions of U.S. Patent No. 6,401,029 to Kubota et al. ("Kubota").

Applicant respectfully requests reconsideration of the amended application in light of the remarks below.

### **Amendments**

#### **Claim 1**

Claim 1 has been amended to more clearly recite one embodiment of the Applicant's invention. Specifically, claim 1 now recites "a central monitor remote from the image sensor, wherein the central monitor displays an image from the image sensor."

Support for this amendment may be found throughout the specification, and specifically at page 14, lines 23-30 (paragraph 59). Therefore, Applicant respectfully submits that this amendment adds no new matter to the application.

Claim 1 has also been amended to recite language recommended by the Examiner in order to overcome a rejection under 35 U.S.C. §101. Applicant respectfully submits that this amendment adds no new matter to the application.

Claim 2

Claim 2 has been amended to recite language recommended by the Examiner in order to overcome a rejection under 35 U.S.C. §101. Applicant respectfully submits that this amendment adds no new matter to the application.

Claim 11

Claim 11 has been amended to more clearly recite one embodiment of the Applicant's invention. Specifically, claim 11 now recites "displaying the object image on a central monitor remote from the image sensor."

Support for this amendment may be found throughout the specification, and specifically at page 14, lines 23-30 (paragraph 59). Therefore, Applicant respectfully submits that this amendment adds no new matter to the application.

Claim 18

Claim 18 has been amended to more clearly recite one embodiment of the Applicant's invention. Specifically, claim 18 now recites "a central monitor remote from the image sensor, wherein the central monitor displays an image from the image sensor."

Support for this amendment may be found throughout the specification, and specifically at page 14, lines 23-30 (paragraph 59). Therefore, Applicant respectfully submits that this amendment adds no new matter to the application.

Claim 29

Claim 29 has been amended to more clearly recite one embodiment of the Applicant's invention. Specifically, claim 29 now recites "wherein the central monitor displays an image from the image sensor and a location from the location sensor."

Support for this amendment may be found throughout the specification, and specifically at page 14, lines 23-30 (paragraph 59). Therefore, Applicant respectfully submits that this amendment adds no new matter to the application.

Remarks

Claims 1 and 2 - §101 Rejections

Claims 1 and 2 stand rejected under §101 as not being directed to patentable subject matter. Applicant has amended claims 1 and 2 in a manner recommended by the Examiner to overcome these rejections.

Therefore, Applicant respectfully submits that the §101 rejection of these claims is now moot. Hence, Applicant respectfully requests withdrawal of the §101 rejection of these claims.

Independent claims 1, 11, 18 and 29

Independent claim 1 stands rejected as being anticipated by Kimura. Claim 1 has been amended to recite, in part, “a central monitor remote from the image sensor, wherein the central monitor displays an image from the image sensor.” Applicant respectfully submits that Kimura, and indeed Clapper and Kubota, do not teach or suggest such a recitation.

Kimura, Clapper and Kubota do not teach a monitor to display images remotely from the image sensor in those references. To the extent that the previous rejection of claim 29 and/or claim 30 may be read to assert otherwise, such assertions are respectfully traversed. Clapper does discuss a computer in communication with a multimedia device, but it never discusses a monitor related to that computer displaying images made with the multimedia device. The only display of images in Clapper occurs at the display apparatus on the multimedia device itself.

Because Kimura does not teach or suggest all recitations of claim 1, Kimura cannot anticipate claim 1. Therefore, Applicant respectfully requests withdrawal of the §102 rejection of this claim.

Independent claims 11 and 18 stand rejected as being anticipated by Kimur. Independent claim 29 stands rejected as being obvious over Kimura in view of Clapper. Claims 11, 18 and 29 each now contain recitations similar to the recitation discussed above in regards to claim 1.

Because, as discussed above, Kimura and Clapper do not teach or suggest the recitations discussed, Kimura cannot anticipate claims 11 and 18, and Kimura and Clapper do

not establish a prima facie case of obviousness with respect to claim 29. Therefore, Applicant respectfully requests withdrawal of the §102 and § 103 rejections of these claims.

Dependent claim 9

Claim 9 stands rejected as being obvious over Kimura in view of Clapper. Applicant respectfully traverses this rejection because Kimura and Clapper do not teach or suggest all of the recitations of claim 9.

Claim 9 recites “wherein the map is a topological map.” Neither Kimura nor Clapper even mention topological map. The Office Action cites column 6, lines 55-59 of Clapper as teaching or suggesting these recitations. However, this portion of Clapper only recites a general “map mode” and does not mention a topological map. Even more specifically, this portion of Clapper discusses calculating of a travel vector in regards to the map mode. As is known in the art, topological maps may lack scale and/or realistic orientation of landmarks. As such, a “calculated” travel vector will likely have no meaning with respect to a topological map. Thus, at least this portion of Clapper may even teach away from providing a topological map.

Because Kimura and/or Clapper do not teach or suggest “wherein the map is a topological map[,]” Kimura and Clapper do not teach all of the recitations of claim 9. Because Kimura and Clapper do not teach or suggest all of the recitations of claim 9, a prima facie case of obviousness has not been established. Therefore, for at least this reason, Applicant respectfully requests withdrawal of the §103 rejection of this claim. Claim 9 also depends, either directly or indirectly from claim 1, and is therefore believed to be allowable for at least this additional reason.

Dependent claim 30

Claim 30 stands rejected as being obvious over Kimura in view of Clapper. Applicant respectfully traverses this rejection because Kimura and Clapper do not teach or suggest all of the recitations of claim 30.

Claim 30 recites “wherein the central monitor plots a representation of the location on a map.” As discussed above, it is respectfully submitted that neither Kimura nor Clapper teach or suggest a central monitor, remote from the image capture device, as recite in claim 29 from which claim 30 depends. Because neither Kimura nor Clapper teach or suggest a

central monitor remote from the image capture device, they cannot possibly teach or suggest the central monitor plotting a representation of the location on a map as recited in claim 30.

The Office Action cites column 5, lines 33-35 of Clapper as teaching or suggesting these recitations. However, this portion of Clapper only discusses display of a map on the multimedia device, not a remote monitor.

Because Kimura and/or Clapper do not teach or suggest “wherein the central monitor plots a representation of the location on a map[.]” Kimura and Clapper do not teach all of the recitations of claim 30. Because Kimura and Clapper do not teach or suggest all of the recitations of claim 30, a prima facie case of obviousness has not been established. Therefore, for at least this reason, Applicant respectfully requests withdrawal of the §103 rejection of this claim. Claim 30 also depends, either directly or indirectly from claim 29, and is therefore believed to be allowable for at least this additional reason.

Dependent claims 2-8, 10, 12-17 and 19-28

Claims 2-10, 12-17, 19-28 and 30 each depend, either directly or indirectly, from one of claim 1, 11, 18 or 29, and are therefore believed to be allowable at least by virtue of their dependence from allowable base claims. Therefore, for at least this reason, Applicant respectfully requests withdrawal of the §102 and §103 rejections of these claims.

**CONCLUSION**

For at least all of the foregoing reasons, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

/ Matthew T. Sarles /

Matthew T. Sarles  
Reg. No. 58,696

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 303-571-4000  
Fax: 415-576-0300  
MTS:cmb  
61054832 v1